

**LOCAL BANKRUPTCY FORM 9013-3**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

JOHN MICHAEL BRADLEY, AKA J.  
MICHAEL BRADLEY, AKA MICHAEL  
BRADLEY, AKA MIKE BRADLEY AND  
REBECCA S. BRADLEY

**CHAPTER** 12

**CASE NO.** 4-15-bk-01370

**Debtor(s)**

JOHN MICHAEL BRADLEY, AKA J.  
MICHAEL BRADLEY, AKA MICHAEL  
BRADLEY, AKA MIKE BRADLEY AND  
REBECCA S. BRADLEY

**ADVERSARY NO.**   -   ap-    
(if applicable)

**Plaintiff(s)/Movant(s)**

vs.

USA, ACTING THROUGH USDA, FARM  
SERVICE AGENCY, PENNSYLVANIA  
DEPARTMENT OF REVENUE, OCWEN LOAN  
SERVICING, LLC, ET AL

**Nature of Proceeding:** Motion to Sell

Real Estate

**Defendant(s)/Respondent(s)**

**Document #:** 55

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.<sup>2</sup>

Reason for the continuance.

The Debtors' attorney and Mario Hanyon, Esquire, the attorney for the Bank of New York, are requesting a continuance of 2-4 weeks to allow for ongoing settlement discussions.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 1/25/18

s/John A. DiGiambardino, Esquire

Attorney for DEBTOR

Name: John A. DiGiambardino, Esquire

Phone Number: 610-372-9900

<sup>1</sup> No alterations or interlineations of this document are permitted.